

**SF-83 SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**FEDERAL PLAN REQUIREMENTS FOR LARGE MUNICIPAL WASTE
COMBUSTORS CONSTRUCTED ON OR BEFORE SEPTEMBER 20, 1994
(40 CFR part 62, subpart FFF)
RENEWAL**

Federal Plan Recordkeeping and Reporting for Large Municipal Waste Combustors
Constructed on or Before September 20, 1994 (40 CFR part 62, subpart FFF)

1. Identification of the Information Collection

1(a) Title of the Information Collection

Information Collection Request (ICR) for 40 CFR part 62, subpart FFF; Federal Plan Requirements for Large Municipal Waste Combustors Constructed on or before September 20 1994.

1(b) Short Characterization/Abstract

The Federal Plan Requirements for Large Municipal Waste Combustors Constructed on or before September 20, 1994, published at 40 CFR part 62, subpart FFF were proposed on January 23, 1998 (63 FR 3509) and promulgated on November 12, 1998 (63 FR 63191). Subpart FFF applies to all municipal waste combustion (MWC) units with a combustion capacity greater than 250 tons per day of municipal solid waste (large MWC units) if construction of the unit commenced on or before September 20, 1994 and the unit is not covered by an Environmental Protection Agency (EPA)-approved and currently effective State or Tribal Plan.

Under the authority of Clean Air Act (CAA) sections 111 and 129, EPA required states and approved tribes to submit plans to the EPA for approval by December 19, 1996 detailing how they would implement and enforce the CAA emission guidelines (40 CFR part 60, subpart Cb) for large MWCs. Because the subpart Cb emission guidelines are not federally enforceable, CAA section 129 also required EPA to promulgate a Federal Plan (40 CFR part 62, subpart FFF) to implement and enforce the emission guidelines in states that did not submit an approvable plan to EPA by December 19, 1997. The reporting and recordkeeping requirements of Subpart FFF apply to large MWCs not covered by an EPA-approved and effective State or Tribal Plan to implement and enforce subpart Cb.

The EPA regional offices collect the required information to ensure the subpart FFF Federal Plan is being implemented and enforced for affected facilities. States or tribes collect the information required to implement and enforce Subpart Cb. The aggregate burdens of implementing and enforcing subpart FFF remain constant, but the burden associated with subpart

FFF shifts to subpart Cb when a State or Tribal Plan is approved by EPA and the Federal Plan is no longer applicable in that area. This information is being collected to assure compliance with 40 CFR part 62, subpart FFF.

Subpart FFF requires initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential to determine compliance, and are required of all sources subject to the NSPS. Subpart FFF contains the same testing, monitoring, recordkeeping and reporting requirements as Subpart Eb and subpart Cb. This occurs because Section 60.39b of subpart Cb requires that for a State Plan or Tribal Plan to be approved, it must contain the recordkeeping and reporting requirements of Subpart Eb. Because the Federal Plan is applicable in lieu of State or Tribal Plans for MWCs in areas that do not have approved State or Tribal Plans, the Federal Plan also contains the same recordkeeping and reporting as subparts Eb and Cb.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports in states or tribal areas with an approved and currently effective Plan are sent to the delegated state, tribal, or local authority. The reports are sent directly to the EPA Regional Office for MWCs in states or tribes that do not have an approved and currently effective Plan.

Approximately 41 MWC units at 16 plants in nine states are currently subject to the requirements of Subpart FFF. EPA does not anticipate that any additional sources will become subject to subpart FFF in the next three years. Over the next three years, EPA expects to approve State Plans in two states which currently lack approved Plans. Upon approval of the two State Plans, Subpart FFF would no longer apply to 7 MWC units at 4 plants in the states. As such, this ICR uses the average number of facilities affected by subpart FFF to estimate respondent and EPA costs. The MWCs monitoring, recordkeeping and reporting burden would remain unchanged because the subpart Cb State or Tribal Plan contain requirements identical to those of subpart FFF.

The Office of Management and Budget (OMB) included the following “Terms of Clearance:”

This information collection request is approved for one year. When EPA resubmits the ICR for renewal, it should ensure that all burden is appropriately accounted for, including burden associated with any 3rd party collection - in this case the States. EPA is also reminded that burden and cost estimates are to be re-evaluated every three years as part of the ICR renewal process and that all supporting documentation should address the upcoming three year period for which approval is being sought.

EPA has addressed each item of concern to OMB. First, this ICR addresses the burden of large MWC units and EPA. As indicated above, this ICR is associated with the burden of large MWC units not subject to an EPA-approved and effective State or Tribal Plan. The burden associated with 40 CFR part 62 part, subpart FFF shifts to 40 CFR part 60, subpart 62 and a State or Tribe when a State or Tribal Plan is approved by EPA. Thus, there is no State burden associated with ICR 1847.03. EPA plans to address the State burden in a future, separate, rule-related ICR. As a standard procedure, EPA reviewed the “costs estimate” for this ICR renewal. OMB’s concerns are also addressed in Section 3(b).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

EPA is required under section 129 of the CAA, as amended, to establish guidelines for existing stationary sources that reflect the maximum achievable control technology for achieving continuous emission reductions:

Section 129(a)(1) states:

The Administrator shall establish performance standards and other requirements pursuant to section 111 and this section of each category of solid waste incineration units. Such standards shall include emissions limitations and other requirements applicable to new units and guidelines (under section 111(d) and this section) and other requirements applicable to existing units.

Section 129(a)(2) states:

Standards applicable to solid waste incineration units promulgated under section 111 and this section shall reflect the maximum degree of reduction in emissions of air pollutants listed under section (a)(4) that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for new or existing units in each category.

Section 129(b)(1) states:

Performance standards under this section and section 111 for solid waste incineration units shall include guidelines promulgated pursuant to section 111(d) and this section applicable to existing units. Such guidelines shall include, as provided in this section, each of the elements required by subsection (a) (emissions limitations, notwithstanding any restriction in section 111(d) regarding issuance of such limitations), subsection (c) (monitoring),

subsection (d) (operator training), subsection (e), (permits), and subsection (h)(4) (residual risk).

Section 129 also requires EPA to develop a Federal Plan to enforce the emission guidelines for any state that has not submitted an approvable State Plan by December 19, 1997. Section 129(b)(3) is the legal authority for the MWC Federal Plan.

Section 129(b)(3) states:

The Administrator shall develop, implement, and enforce a Plan for existing solid waste incineration units within any category located in any State which has not submitted an approvable Plan under this subsection with respect to units in such category within 2 years after the date on which the Administrator promulgated the relevant guidelines.

The Administrator believes the reports and records required by 40 CFR part 62, subpart FFF are necessary to ensure that the MWC Federal Plan requirements are being achieved on a continuous basis.

In the Administrator's judgment, cadmium, lead, mercury, dioxin, sulfur dioxide, hydrogen chloride, nitrogen dioxide, particulate matter, and other pollutants emitted from large MWCs cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, 40 CFR part 62, subpart FFF was promulgated to ensure coverage of MWCs not covered by an EPA-approved State or Tribal plan.

2(b) Practical Utility/Users of the Data

The control of emissions of acid gas, particulate matter, dioxin/furan, and other hazardous pollutants from MWCs requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. The notifications required in the applicable regulations are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and/or leaks are being detected and repaired and the regulations are being met. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standards, and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by subpart FFF continue to operate the control equipment and achieve continuous compliance with the regulation. Adequate monitoring, recordkeeping and reporting is necessary to ensure compliance with the applicable regulations, as required by the

CAA. The information collected from monitoring, recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 62, subpart FFF.

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA Regional Office. Otherwise, the information is sent directly to the delegated state, tribal, or local agency. If states or tribes have not developed a State or Tribal Plan or requested delegation of enforcement, yet still require information from the facility, the facility owner or operator may submit a copy of the state, tribal, or local reports to the EPA Administrator in lieu of the report required by the Federal Plan, if the same information is provided. Therefore, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to the Office of Management and Budget

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register on June 20, 2002 (67 FR 41981). No comments were received on the burden published in the Federal Register.

The OMB “Terms of Clearance” are primarily concerned about the burden associated with third party collections - in this case the States. There is no State burden associated with ICR 1847.02. The State burden that OMB is referring to is associated with in another rule, 40 CFR part 60, subpart Cb. EPA plans to address the State burden in future, separate, rule-related ICR. The OMB “Terms of Clearance” also asked EPA to reevaluate the “cost estimates” with every renewal cycle (i.e., three years). As a standard procedure, EPA reviews “costs estimates” with every ICR renewal.

3(c) Consultations

EPA undertook a number of steps to assess the number of facilities affected by subpart FFF. EPA Headquarters obtained updated information from EPA Regional offices on the number of MWC plants and units covered by the Federal Plan. EPA Headquarters compared this information to a new inventory of MWC Plants and units covered by State Plans. EPA also utilized information in the primary EPA databases on the number of existing sources regulated by the CAA. Finally, EPA contacted the Integrated Solid Waste Association, an industry trade

group, and sought information on the number of facilities affected by subpart FFF.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by the OMB at 5 CFR 1320.5.

3(f) Confidentiality

The required information has been determined not to be confidential. However, any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of existing MWCs with a capacity to combust greater than 250 tons per day that are located in areas that are not yet covered by an EPA-approval State or Tribal Plan. The North American Industry Classification System (NAICS) Code for the respondents are 92411, Air and Water Resource and Solid Waste Management (formerly United States Standard Industrial Classification (SIC) Code 9511, Air and Water Resource and Solid Waste Management), and NAICS Code 562213, Solid Waste Combustors and Incinerators (formerly SIC Code 4953, Refuse Systems).

4(b) Information Requested

These standards require affected facilities to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five year records retention requirement is consistent the Part 70 permit program and the five year statute of limitations on which the permit program is based. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

(i) Data Items

All data in this ICR that is recorded and/or reported is required by the Federal Plan Requirements for Large Municipal Waste Combustors Constructed on or Before September 20, 1994, 40 CFR [art 62,subpart FFF. Facilities affected by Subpart FFF must comply with the reporting and recordkeeping provisions listed in the Standards of Performance for Large Municipal Waste Combustors for Which Constructed is Commenced After December 20, 1989 and on or Before September 20, 1994, 40 CFR part 60, subpart Eb.

A source must make the following reports:

Reports for Facilities Affected By 40 CFR part 62, subpart FFF	
Notification of completion of each increment of progress, including final control plan.	62.14108; 62.14109(e), (f), (g), (h), (m)
Notification of exemptions, including alternatives, limitations, cease operations, and de-rating requests.	62.14102(c), (e)-(g), (j), (k), (m); 62.14108(c)(4); 62.14109(j)-(l); 60.59(l)
Notification of initial performance tests (PM, dioxin/furan, opacity, HCl, Cd, Pb, Hg, fugitives).	60.8(d) of General Provisions
Report initial performance tests for all regulated pollutants and parameters.	62.14109(c); 62.39b(a); 62.58b; 60.59b(f)
Report of CEMS demonstration and test data.	62.39b(a); 60.59b(f)
Annual compliance reports for all pollutants and parameters.	62.14109(d); 60.59b(g)

Reports for Facilities Affected By 40 CFR part 62, subpart FFF	
Site-specific operating manual	62.14105(e)
Training records	62.14105(g)
Semiannual excess emission reports (SO ₂ , CO, load, temperature, PM, dioxin/furan, opacity, HCl, Cd, Pb, Hg, fugitives).	62.39b(a); 60.59b(h)

A source must maintain the following records:

Recordkeeping for Facilities Affected by 40 CFR part 62, subpart FFF	
Records of CEMS rates and parameters and computations of average emissions and parameters.	62.14109(a); 62.39b(a); 60.59b(d)
Records of initial performance tests and annual performance tests, including final control plan.	62.14109(a), (i); 62.39b(a); 60.59b(d)-(e)
Records of results of daily CEMS drift tests and Appendix F accuracy assessments.	62.14109(a); 62.39b(a); 60.59b(d)
Records of the occurrence and duration of any startup, shutdown, or malfunction of the facility or any malfunction of the CEMS.	62.39b(a); 60.59b(d)
Records of quarterly amount of sorbent used for Hg control.	62.14109(a); 62.39b(a); 60.59b(d)
Records of names of persons who have completed review of operating manual.	62.1405(g); 62.14109(a); 62.39b(a); 60.59b(d)
Records are required to be retained for 5 of years at the facility.	62.14109(a); 62.39b(a); 60.59b(d)-(f), (j)-(k)

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate continuous monitoring for sulfur dioxide, nitrogen oxides, opacity, carbon monoxide, load level, temperature of the fuleu gas stream, and oxygen or carbon dioxide.
Perform initial performance test, applicable Reference Method(s) test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Affected facilities typically use computers for collection and reduction of operating parameter data. Facilities can maintain records in electronic format. Electronic submissions are not made because many reports to EPA are one time events, others are submitted directly to State, Tribal, or local agencies not EPA. Most State, Tribal, and local agencies do not use electronic reporting and EPA does not have the authority to insist on electronic reporting by those agencies.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage,

and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the AIRS (Aerometric Information Retrieval System) Facility Subsystem (AFS) database.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The annual compliance reports are designed to monitor all pollutants and parameters. The semiannual excess emission reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial and government-owned facilities. EPA uses AFS for tracking air pollution compliance and enforcement by local, tribal, and state regulatory agencies, EPA Regional Offices and EPA Headquarters. EPA and its delegated authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner or operator for five years.

5(c) Small Entity Flexibility

There are no small businesses affected by this regulation. The regulation does not contain any special provisions that establish differing compliance, reporting or recordkeeping requirements or timetables that take into account the respondents resources.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Cost of the Recordkeeping and Reporting Requirements of the Federal Plan for Existing MWC Units Subject to subpart FFF.

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the Subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 2,204,718 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates: \$85.81 per hour for Executive, Administrative, and Managerial labor; \$57.12 per hour for Technical labor, and \$36.27 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2001, "Table 10. Private industry, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry. Thus, the rates are: Managerial

\$85.81 (\$40.86 + 110%); Technical \$57.12 (\$27.20 + 110%); and Clerical \$36.27 (\$17.27 +110%)

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activity in the regulations are for labor and continuous emission monitoring. The capital/startup costs are one time costs when a facility becomes subject to the regulation and are not part of this ICR. The annual operation and maintenance costs are the ongoing costs to maintain the continuous emission monitoring and air pollution control device and other costs such as photocopying and postage.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup costs associated with this ICR.

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Startup Cost for One Affected Facility	(C) Number of New Affected Facilities to Startup	(D) Total Startup (B X C)	(E) Annual O&M Costs for One Affected Facility	(F) Average Number of Affected Facilities with O&M	(G) Total O&M (E X F)
For incinerator and air pollution control device	0	0	0	86275	14	1207850

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table. These costs are shown in block 14(a), Total annualized capital/startup costs, on the OMB 83-I form. It should be noted that the numbers in block 14 of the OMB 83-I form are rounded to show the cost in thousands of dollars.

The total operation and maintenance (O&M) costs for this ICR are \$1,207,850. This is the total of column G. The annual cost (1,207,850/3) are 402,617 and is shown in block 14(b), Total annual costs (O&M), on the OMB 83-I form.

The total respondent non-labor costs in block 14 have been calculated as the addition of the capital/startup costs and the annual operation and maintenance costs. The average annual operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$402,617. This cost is shown on the OMB 83-I form in block 14 (c), Total annualized cost requested. The numbers in block 14 of the OMB 83-I form are rounded to show the cost in

thousands of dollars.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program.

The average annual Agency cost during the three years of the ICR is estimated to be \$108,850. This cost is based on a labor breakdown as follows: Managerial \$53.22 (GS-13, Step 5, \$33.26 x 1.6); Technical \$39.49 (GS-12, Step 1, \$24.68 x 1.6); and Clerical \$21.38 (GS-6, Step 3, \$13.36 x 1.6).

These rates are from the Office of Planning and Management (OPM) "2003 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Maximum Annual Federal Government Burden and Cost of Recordkeeping and Reporting Requirements of the Federal Plan for Existing MWC Units Subject to Subpart FFF.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Respondent Universe and Number of Responses Per Year						
Regulation Citation	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Sources	(C) Average Number of Existing Respondents	(D) Number of Reports for Existing Sources	(F) Number of Respondents that keep records but do not submit reports	(E) Total Annual Responses = (AxB)+(Cx D)+ F
42 CFR Part 60, Subpart FFF	0	0	14	7	0	98

The average number of total respondents is 14. This number is the sum of column A and column C of the Average Respondent Universe and Number of Responses Per Year table. This represents the average number of existing sources over the 3 year ICR period. It is estimated that no additional sources per year will become subject to the regulation in the next three years. It is estimated, however, that the number of respondents will decrease as EPA-approved State Plans cover areas currently under the Federal Plan. It is shown in block 13 (a), Number of respondents, on the OMB 83-I form.

The number of Total Annual Responses is 98. This is the number in column E of the Respondent Universe and Number of Responses Per Year table. It is shown in block 13 (b), Total annual responses, on the OMB 83-I form.

The total annual labor costs are 2,204,718. This number is not shown on the OMB 83-I form. Details upon which this estimate is based appear in Table 1. Annual Respondent Burden and Cost, for the Federal Plan Requirements for Large Municipal Waste Combustors Constructed on or before September 20 1994.

The total annual capital and O&M costs to the regulated entity are 402,617. This number is shown on the OMB 83-I form in block 14 (c), Total annualized cost requested. These costs are detailed in section 6(b)(iii), Capital/Startup vs. Operating and Maintenance (O&M) Costs.

6(e) Bottom Line Burden Hours And Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 399 hours per response.

6(f) Reasons for Change in Burden

The decrease in burden from the most recently approved ICR is due to an adjustment. The adjustment decrease is due to multiple factors. First, a revised inventory identified a decrease in the number of affected sources. Second, over the next three years, EPA expects to approve State Plans in two states which currently lack approved Plans. Upon approval of the two State Plans, subpart FFF would no longer apply to 7 MWC units in these states. Third and finally, this ICR uses updated labor rates to estimate the respondent costs and agency costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 399 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

To comment on the Agency's need for this information, the accuracy of the provided

burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number OECA-2003-0001, which is available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Ave., N.W., Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for Enforcement and Compliance Docket and Information Center is (202) 566-1514. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. Use EDOCKET to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select “search,” then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number OECA-2003-0001 and OMB Control Number 2060-0390 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.